

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

ANGEL ENRIQUE NUNEZ ESCOBAR,)
et al.,)
Plaintiffs,) Case No. 3:11-cv-994
v.)
LEE GAINES et al.,)
Defendants.

MOTION FOR SUBSTITUTION OF COUNSEL

Defendants Gary Kemper and Shaun Hardin (“Defendants”) hereby move for Keli J. Oliver and Melissa Roberge of the Department of Law to be substituted as counsel for Defendants in place of Allison L. Bussell, Christopher M. Lackey, and R. Alex Dickerson. For cause, Ms. Oliver and Ms. Roberge would show that Ms. Bussell has departed from the Department of Law, and Mr. Dickerson has been reassigned to another litigation team. Mr. Lackey has not been assigned to this matter for some time. Therefore, Defendants requests entry of an Order reflecting the substitution of Keli J. Oliver and Melissa Roberge as counsel for Defendants in this matter. Formal Notices of Appearance for Ms. Oliver and Ms. Roberge are filed contemporaneously herewith. The previous appearance by James E. Robinson is unchanged by this motion.

Wherefore, Defendants request that the Court enter an Order allowing Keli J. Oliver and Melissa Roberge to be substituted in place of Ms. Bussell, Mr. Lackey and Mr. Dickerson as counsel of record for Defendants.

Respectfully submitted,

THE DEPARTMENT OF LAW OF THE
METROPOLITAN GOVERNMENT OF
NASHVILLE AND DAVIDSON COUNTY
SAUL SOLOMON (#11689)
DIRECTOR OF LAW

/s/ Keli J. Oliver
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served electronically, via the CM/ECF filing system, on the 3rd day of March, 2015 to:

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/s/Keli J. Oliver
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